

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

UNITED STATES OF AMERICA <i>ex rel.</i>	§	
JESUS NUNEZ-UNDA,	§	
	§	
Plaintiff,	§	
	§	5:22-CV-659-FB
v.	§	
	§	
LAFAYETTE RE MANAGEMENT LLC,	§	
BRANDYWINE HOMES USA LLC, and	§	
THIBAULT ADRIEN,	§	
	§	
Defendants.	§	

**JOINT STIPULATION OF DISMISSAL**

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i) and 31 U.S.C. § 3730(b)(1), and subject to the terms and conditions of the Settlement Agreement attached hereto as Exhibit A, the United States and relator Jesus Nunez-Unda (“Relator”) hereby stipulate to the dismissal of all claims in this action against defendants Lafayette RE Management LLC, Brandywine Homes USA LLC, and Thibault Adrien.

The United States and Relator further stipulate that such dismissal shall be (1) with prejudice to the United States as to the claims against defendants Lafayette RE Management LLC and Thibault Adrien set forth in Paragraph 3 of the Settlement Agreement; (2) without prejudice to the United States as to all other claims asserted in this action; and (3) with prejudice to Relator as to all claims asserted against all defendants.

The parties respectfully request that the Court retain jurisdiction to enforce the terms of the Settlement Agreement.

Dated: December 20, 2024

Respectfully submitted,

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United States Attorney

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	§	
Defendants.	§	

**[PROPOSED] ORDER**

This matter came before the Court on the United States' and relator Jesus Nunez-Unda's Joint Stipulation of Dismissal of all claims against defendants Lafayette RE Management LLC, Brandywine Homes USA LLC, and Thibault Adrien. It is hereby ORDERED that all claims asserted in this action are dismissed as to all defendants. Such dismissal shall be (1) with prejudice to the United States as to the claims against defendants Lafayette RE Management LLC and Thibault Adrien set forth in Paragraph 3 of the Settlement Agreement; (2) without prejudice to the United States as to all other claims asserted in this action; and (3) with prejudice to Relator as to all claims asserted against all defendants.

The Court shall retain jurisdiction over the parties to enforce the terms of the Settlement Agreement among them.

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 202\_\_.

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THE HONORABLE FRED BIERY  
UNITED STATES DISTRICT JUDGE